

July 25, 2019

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: Implementing Kari's Law and Section 506 of RAY BAUM'S Act, PS Docket Nos.
18-261 and 17-239, GN Docket No. 11-117*

Dear Ms. Dortch:

On July 23, 2019, on behalf of Apple Inc., I spoke via telephone with David Furth, Deputy Chief of the Public Safety and Homeland Security Bureau, regarding the draft Report and Order in the above-referenced proceeding that accompanied the tentative agenda for the August 2019 Open Commission Meeting.

During this call, I observed that the draft item likely intended Final Rule Section 9.11(b)(4)(ii)(B)(3) to apply only when a non-fixed interconnected VoIP service is used to call 911, but the provision as drafted potentially created ambiguity as to the scope of the requirement. I explained that the Commission could remove any such ambiguity by adding the bolded language to subparagraph 3 as follows: "The service provider must identify whether the service is being used **to call 911** from a different location than the Registered Location ..."

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced dockets. If you require any additional information, please contact the undersigned.

Sincerely,

/s/ Paul Margie

Paul Margie
Counsel for Apple Inc.

cc: David Furth